

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JOHN DOES 1 THROUGH 7,

Plaintiffs,

- against -

THE TALIBAN *et al.*,

Defendant.

No. 20 Misc. 740 (KPF) (SN)

IN RE: TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

No. 03 MD 1570 (GBDN) (SN)

FIONA HAVLISH *et al.*,

Plaintiffs,

- against -

SHEIKH USAMAH BIN-MUHAMMED  
BIN-LADEN, a.k.a. OSAMA BIN-LADEN  
*et al.*,

Defendants.

No. 03 Civ. 9848 (GBD) (SN)

**TERRY KAY ROCKEFELLER'S MOTION FOR LEAVE TO FILE BRIEF AS *AMICUS*  
*CURIAE***

Non-party, Terry Kay Rockefeller respectfully submits this memorandum of law in support of her motion for leave to file the accompanying MEMORANDUM OF LAW OF *AMICUS CURIAE* TERRY KAY ROCKEFELLER in the above captioned matters. Plaintiff Fiona Havlish, takes no position with respect to the filing of the annexed brief.

Terry Kay Rockefeller is an award-winning documentary film producer and peace activist. Terry's activism focuses on using storytelling, rule-of-law-based solutions, and restorative justice to break cycles of violence and hatred.

Terry's sister, Laura Rockefeller, was killed in the 9/11 terrorist attacks on the World Trade Center. Since 2002, Terry has worked to honor her sister's life and to advocate for nonviolent actions in the pursuit of justice for 9/11 victims, families, and communities. She has taken up this calling with the hope of breaking the cycles of violence engendered by war and terrorism. Terry has been active in observing the military commission tribunals that have been convened at Guantanamo to try those accused of the 9/11 attacks. Immediately following the U.S.-led invasion of Iraq, Terry was active in seeking ways to support the Iraqi people, and today Terry works with the Iraqi Civil Society Solidarity Initiative, a collaboration between Iraqi and international NGOs to support human rights, democracy, and anti-corruption activists in Iraq.

In her work supporting the Afghani people, Terry rejects the idea that the war in Afghanistan was a "good war" or that there was a way to "win." The material and psychic loss that accompany war and violent conflict are known catalysts for terrorist recruitment. Terry has been involved in efforts to disrupt that cycle of violence by, among other initiatives, lobbying Congress for payments for Afghan civilian casualties of the U.S.-led invasion.

From 2003 to 2009, Terry was a member of the board of directors of Murder Victims Families for Reconciliation an organization that works to abolish the death penalty in the United States. Because of her long-standing opposition to capital punishment, she gave a victim impact statement for the defense in the case of *United States v. Moussaoui*, and was gratified that the defendant received a sentence of life without parole. From 2013 to 2019, she served on the board of directors of Amnesty International-USA.

Terry is currently a National Co-convener of United for Peace and Justice, a coalition of U.S. peace, nonviolence and social justice organizations. Terry is also a member of the board of directors of the Campaign for Peace, Disarmament and Common Security. She speaks regularly

about the need for nonviolent, law-based responses to terrorism, as well as proactive efforts to address the root causes of hatred and violence. Terry is a member of Peaceful Tomorrows, but neither she nor any of her family members are parties to any of the 9/11 cases, nor does Terry or any of her family members have a financial interest in the outcome of the 9/11 cases.

The above captioned cases provide an opportunity to hold people, governments, and institutions civilly accountable for their roles in the September 11th attacks. Terry has a direct interest in these cases because she lost her sister in the September 11th attacks, and as a result, Terry has devoted her life to breaking the cycles of violence that lead to terrorism, hatred, and large-scale human suffering.

For the foregoing reasons, Terry Kay Rockefeller respectfully submits that the Court should grant leave to file the proposed brief as *amicus curiae*.

Respectfully submitted,

s/ Jacob M. Kaplan

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